



**THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007**

MURIEL GOODE-TRUFANT
Corporation Counsel

Lora Minicucci
Deputy Chief
Labor & Employment Law Division
phone: 212-356-2078
lminicuc@law.nyc.gov

June 7, 2025

By Email

Yetta G. Kurland
The Kurland Group
86 Broad Street, 28th Floor
New York, New York 10004

Re: *Local 2507 et al. v. City of New York*, 22-cv-10036 (AT) (GWG)

Dear Counsel:

We write to describe the City's search for documents responsive to Request for Production No. 22 in Plaintiffs' Fourth Combined Set of Interrogatories and Request for Production of Documents.

To locate documents responsive to Request for Production No. 22, Robert Alexander (Assistant Commissioner for Bureau of Examinations) searched his email box, local electronic files, and shared electronic files where Mr. Alexander reasonably believed responsive documents might be located. Mr. Alexander located the 1998 Notice of Examination produced by the City on February 20, 2025 at LOCAL 2507-DEF-0031508-31511. Phoebe Fong (Director of Exam Development Group), William Lotti (Deputy Director of Exam Development Group), and Rene Pryor (Deputy Director of Exam Development Group) also conducted searches of their email inboxes, local electronic files, and shared electronic files where they reasonably believed responsive documents might be located. Following the conclusion of their search, Mrs. Fong, Mr. Lotti, and Mrs. Pryor confirmed they could not locate documents responsive to this Request. Mr. Alexander, Mrs. Fong, Mr. Lotti, and Mrs. Pryor collectively spent approximately seven hours looking through these locations for responsive documents.

Sincerely,

/s/ Lora Minicucci

Lora Minicucci
Assistant Corporation Counsel